

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA  
PITTSBURGH DIVISION**

*IN RE:* :  
 :  
J.T. AND SON CONSTRUCTION, LLC : Case No.: 23-21623-JCM  
 : (Chapter 11)  
Debtor :  
 :  
\_\_\_\_\_

CHANNEL PARTNERS CAPITAL, LLC :  
 :  
Movant :  
 :  
v. : Related to Dkt. No(s). 112  
 :  
J.T. AND SON CONSTRUCTION, LLC :  
 :  
Respondent :

**NOTICE OF HEARING AND RESPONSE DEADLINE REGARDING  
MOTION OF CHANNEL PARTNERS CAPITAL, LLC FOR RELIEF  
FROM AUTOMATIC STAY OR, IN THE ALTERNATIVE,  
TO COMPEL PAYMENT OF ADEQUATE PROTECTION**

TO THE RESPONDENT(S):

You are hereby notified that the Movant seeks an order affecting your rights or property.

You are further instructed to file with the Clerk and serve upon the undersigned attorney for Movant a response to the Motion by no later than October 23, 2023 (i.e., seventeen (17) days after the date of service below), in accordance with the Federal Rules of Bankruptcy Procedure, the Local Rules of this Court, and the general procedures of the presiding judge as found on the Court's webpage at [www.pawb.uscourts.gov](http://www.pawb.uscourts.gov). If you fail to timely file and serve a written response, an order granting the relief requested in the Motion may be entered and the hearing may not be held. Please refer to the calendar posted on the Court's webpage to verify if a default order was signed or if the hearing will go forward as scheduled.

You should take this Notice and the Motion to a lawyer at once.

A hearing will be held on Thursday, December 21, 2023, at 2:00 PM before Judge John C. Melaragno in Courtroom C, 54<sup>th</sup> Floor U.S. Steel Tower, 600 Grant Street, Pittsburgh, PA 15219. Only a limited time of ten (10) minutes is being provided on the calendar. No witnesses will be heard. If there is an issue of fact, an evidentiary hearing will be scheduled by the Court for a later date.

Date of Service: October 6, 2023

Respectfully submitted,

THE LAW OFFICES OF RONALD S. CANTER, LLC

*/s/ Ronald S. Canter*

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Ronald S. Canter, Esquire

PA Bar #94000

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[rcanter@roncanterllc.com](mailto:rcanter@roncanterllc.com)

**Counsel for Secured Creditor,  
Channel Partners Capital, LLC**

**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a true and correct copy of the foregoing was served upon the individual(s) listed below by Electronic Notification pursuant to ECF procedures on this 18<sup>th</sup> day of October, 2023, to:

Brian C. Thompson, Esq.  
Thompson Law Group, P.C.  
125 Warrendale Bayne Road  
Suite 200  
Warrendale, PA 15086  
[bthompson@ThompsonAttorney.com](mailto:bthompson@ThompsonAttorney.com)  
**Counsel for Debtor**

Jodi Hause, Esq.  
Office of the United States Trustee  
Suite 960, Liberty Center  
1001 Liberty Avenue  
Pittsburgh, PA 15222  
[jodi.hause@usdoj.gov](mailto:jodi.hause@usdoj.gov)  
**Attorney for U.S. Trustee**

and mailed, first class, postage pre-paid this 18<sup>th</sup> day of October, 2023, to:

J.T. and Son Construction, LLC  
64 Halstead Boulevard  
Zelienople, PA 16063  
**Debtor**

and to the Local Rule 1007-2(b) Parties in Interest identified on the creditor matrix attached hereto as Exhibit B.

/s/ Ronald S. Canter  
Ronald S. Canter